

Message

From: Allen, Greg [allen.greg@epa.gov]
Sent: 10/6/2020 1:22:23 PM
To: cassandra.davis@dec.ny.gov; Nora Jackson [njackson@chesapeakebay.net]
CC: Stephanie Hanses [SHanses@BrwnCald.com]; Stephanie MacDurmon [smacdurmon@brwnald.com]; Van Note, Vanessa [VanNote.Vanessa@epa.gov]; Sweeney, Jeff [sweeney.jeff@epa.gov]; Devereux, Olivia [olivia@devereuxconsulting.com]
Subject: RE: Federal Agency BMP Reporting and FPGs

Thank you for the information Cassie!

Greg Allen, PhD
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410 Severn Avenue, Suite 112
Annapolis, Maryland 21401
410-267-5746

From: Davis, Cassandra M (DEC) <Cassandra.Davis@dec.ny.gov>
Sent: Tuesday, October 6, 2020 9:16 AM
To: Nora Jackson <njackson@chesapeakebay.net>
Cc: Stephanie Hanses <SHanses@BrwnCald.com>; Stephanie MacDurmon <smacdurmon@brwnald.com>; Allen, Greg <allen.greg@epa.gov>
Subject: RE: Federal Agency BMP Reporting and FPGs

Hi Nora,

I apologize for the delay. We receive annual BMP data for all DoD installations in New York. We usually report 3-5 BMPs for our DoD facilities. All of the BMPs are able to be reported into NEIEN successfully with the proper facility code. NY did not receive any comments from federal facilities during our WIP III comment period. Since federal facilities make up such a small area of the watershed, the nitrogen and phosphorus reduction from federal facilities for 2025 is estimated to be 127 lbs TN and 31 lbs TP. This was based on the [*Protocol for Setting Targets, Planning BMPs and Reporting Progress for Federal Facilities and Lands*](#).

Below is our section 8.3 from the WIP III on Federal Facilities:

Section 8.3: Federal Facilities

New York's portion of the Chesapeake Bay watershed includes 13 facilities run by federal agencies. The facilities and the agencies running them are shown in Table 25 below.

Table 25: Federal Agency Facilities in the Upper Susquehanna Watershed

Facility Name	Federal Agency
Binghamton Armory	Army National Guard
Hornell Armory	Army National Guard
Horseheads Armory	Army National Guard
Windsor Training Site	Army National Guard
Whitney Point Lake	Army Corps of Engineers
Almond Lake	Army Corps of Engineers
East Sidney Lake	Army Corps of Engineers
U.S. Reservation	Army Corps of Engineers
Big Flats Plant Material Center	Department of Agriculture

Woodlawn National Cemetery	Department of Veterans Affairs
Fed Building & CTHSE-Binghamton	General Services Administration
Bath National Cemetery	Department of Veterans Affairs
VA Medical Center	Department of Veterans Affairs
Binghamton Armory	Army National Guard

NYS DEC works with federal agency partners that have facilities in the Upper Susquehanna watershed to account for best management practices on federal lands. Once accounted for, NYS DEC expects to include those BMPs in future milestones and Watershed Model progress runs.

In 2015, New York opted to use the default method to set nitrogen, phosphorus, and sediment pollutant reduction targets for federal facilities in New York's portion of the Chesapeake Bay watershed. The default method is described in the document *Protocol for Setting Targets, Planning BMPs and Reporting Progress for Federal Facilities and Lands* dated June 11, 2015.

Feel free to give me a call if you have any other questions.

Thanks,
Cassie




Cassandra M. Davis

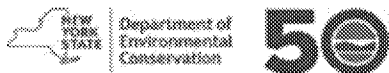
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From: Nora Jackson <njackson@chesapeakebay.net>

Sent: Friday, September 25, 2020 4:32 PM

To: Davis, Cassandra M (DEC) <Cassandra.Davis@dec.ny.gov>

Cc: Stephanie Hanses <SHanses@BrwnCald.com>; Stephanie MacDurmon <smacdurmon@brwnCald.com>; Greg Allen (allen.greg@epa.gov) <allen.greg@epa.gov>

Subject: Federal Agency BMP Reporting and FPGs

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Good afternoon Cassandra,

Following up from the last FFWG meeting, below is a series of questions regarding federal planning goals and calculation methods.

1. Do you coordinate with federal agencies during and after annual reporting?
2. In general, what proportion of federal BMPs include the required information to be successfully reported to NEIEN?
3. Do you ensure that federal BMPs are properly assigned the appropriate federal agency code in NEIEN?
4. If the Phase III WIP defines a numeric FPG, does the specified load include all expected reductions from federal agency lands (applicable source sectors, regulated and unregulated sources)? Please describe which components are quantified.

5. How were federal agencies included in the FPG development process?
6. In what ways were federal agencies' comments addressed/incorporated in the FPGs documented in the Phase III WIPs? How was equity between federal and nonfederal entities considered in the development of FPGs? Is this discussion documented in the Phase III WIP?
7. How were FPGs/federal agency BMP implementation captured in the CAST scenarios submitted with the Phase III WIP?

We're hoping to compile the feedback by the end of next week. I've also copied our contractors from Brown and Caldwell in case you have any questions.

Have a good weekend!

Best,
Nora

Nora Jackson
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